

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE Retreat Behavioral Health LLC

Lead Case No.: 5:23-cv-00026-MRP

**PLAINTIFFS' FOURTH UNOPPOSED
MOTION TO EXTEND DEADLINE FOR
RESPONSE TO DEFENDANTS' MOTION
TO DISMISS**

Plaintiffs James Worton and Lauren Small ("Plaintiffs"), pursuant to Fed. R. Civ. P. 6(b)(1)(A), move to extend by 28 days the deadline for their response to Defendant's Motion to Dismiss and state as follows:

1. On June 21, 2023, Defendants filed their Motion to Dismiss (ECF No. 16).
2. On July 27, 2023, upon Plaintiffs' motion with Defendants' consent, the Court entered an Order extending the deadline for Plaintiffs' response to the Motion to Dismiss to August 18, 2023. (ECF No. 19).
3. On August 17, 2023, upon Plaintiffs' motion with Defendants' consent, the Court entered an Order extending the deadline for Plaintiffs' response to the Motion to Dismiss to September 18, 2023. (ECF No. 21).
4. On September 19, 2023, upon Plaintiffs' motion with Defendants' consent, the Court entered an Order extending the deadline for Plaintiffs' response to the Motion to Dismiss to October 16, 2023. (ECF No. 23).
5. Plaintiffs request a 28-day extension of the deadline for their response, to November 13, 2023, so the parties may continue discussing the potential resolution of this matter.

6. Plaintiffs do not anticipate requesting a further extension of time to respond to the Motion to Dismiss. If the parties cannot reach a tentative settlement prior to November 13, 2023, Plaintiffs intend to file their response on or before that date.

7. Plaintiffs' counsel conferred with Defendants' counsel, who confirmed that Defendants do not oppose the relief sought in this motion.

Date: October 16, 2023

Respectfully Submitted,

/s/ Ryan D. Maxey
K. CLANCY BOYLAN, ESQ. ID# 314117
2005 Market Street, Suite 350
Philadelphia, PA 19103
(215) 446-9795
(215) 446-9799 (FAX)
cboylan@forthepeople.com

Patrick A. Barthle II*
Florida Bar No. 99286
pbarthle@ForThePeople.com
MORGAN & MORGAN
COMPLEX LITIGATION GROUP
201 N. Franklin Street, 7th Floor
Tampa, Florida 33602
Telephone: (813) 229-4023
Facsimile: (813) 222-4708

Ryan D. Maxey*
MAXEY LAW FIRM, P.A.
107 N. 11th St. #402
Tampa, Florida 33602
(813) 448-1125
ryan@maxeyfirm.com

Arthur Stock (PBN 64336)
MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC
800 S. Gay Street, Ste. 1100
Knoxville, TN 37929
Tel: (865) 247-0080
Fax: (865) 522-0049

astock@milberg.com

Attorneys for Plaintiffs and the Proposed Class

*admitted *pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2023, the foregoing document was filed with the Clerk by using the CM/ECF system, which will send notification to all attorneys of record in this matter.

/s/ Ryan D. Maxey